

HAMILTON CITY COUNCIL

LGOIMA Response - Infrastructure Funding Adequacy versus Housing Growth Targets

Response received July 2026 | Refined request on internal assessments of funding adequacy
Public-interest transparency record

1. Purpose of this Note

This note records the formal material released by Hamilton City Council in response to LGOIMA requests concerning whether planned infrastructure funding is adequate to support housing growth targets. It summarises the Council's stated position on total infrastructure cost estimates, funding assumptions, the absence of a standalone internal adequacy assessment, and related capacity constraints. It is prepared as a public-interest transparency record.

2. Request Scope

The original request (June 2026) sought housing growth targets, estimated infrastructure investment required to support those targets (by asset class), the amount currently funded in the 2024–2034 Long Term Plan, identified funding gaps, development contribution recovery, and internal reports assessing funding adequacy.

After Council indicated that identifying all internal reports would require substantial collation, the request was refined to seek any internal reports, briefings, modelling, or advice from 1 January 2023 onwards that assess whether planned infrastructure funding in the 2024–2034 LTP is adequate to support planned housing growth targets, including identified shortfalls, risks, or concerns about funding gaps.

3. Key Formal Findings

3.1 No comprehensive estimate of total infrastructure required

Council states that it does not hold a comprehensive estimate of the total infrastructure required to deliver growth across all serviced areas. The reason given is that a significant portion of that infrastructure is expected to be delivered directly by developers.

3.2 Explicit financial-constraint assumption in the LTP

The 2024–2034 Long Term Plan contains a significant forecasting assumption that:

“as financial constraints do not allow for all growth infrastructure in areas zoned for development, third party funding has been anticipated across all growth cells through the vesting of developer-provided infrastructure and the use of private developer agreements.”

Council's own capital funding figures therefore reflect its share of growth investment (primarily strategic infrastructure and upsize of developer-funded infrastructure) and exclude developer-delivered assets.

3.3 No standalone internal assessment of funding adequacy

On the refined request, Council's position is that it has not identified a separate standalone internal report, briefing, model, or advice document prepared from 1 January 2023 onwards whose purpose is to assess, in isolation, whether the infrastructure funding in the 2024–2034 Long Term Plan is adequate or sufficient to support planned housing growth targets across stormwater, wastewater, and transport.

Council states that the relevant assessment is “captured through” the Long Term Plan and Infrastructure Strategy process. Those documents identify growth assumptions, the

infrastructure proposed for funding, significant forecasting assumptions, and the implications of infrastructure that is not funded within the financial strategy.

3.4 Capacity and sequencing constraints (Growth Approach 2026)

Internal workshop material prepared for the 2027–37 Long Term Plan growth approach (IAWAI Brief, February 2026) records:

- Infill infrastructure capacity constraints, notably wastewater.
- Hamilton South described as heavily constrained by wastewater under current LTP circumstances.
- Potential to unlock further capacity if the Southern Wastewater Treatment Plant is delivered.
- Sensitivities around Fast Track areas and the assumptions made about developer-led delivery.
- Residual residential capacity figures and risks if growth is under- or over-projected.

The brief is framed as establishing a baseline growth scenario and highlighting sensitivities; it does not itself constitute a full costed adequacy test of the funded infrastructure programme.

3.5 Documents identified by Council as containing the relevant information

Council listed the following as the material in which assessments of adequacy, risks, and funding gaps are said to be contained:

- 2024–2034 Long Term Plan and 2024–2054 Infrastructure Strategy
- Council agenda and deliberation material for the 2024–2034 LTP
- Relevant Activity Management Plans (wastewater, stormwater)
- Growth projections and 2027–37 LTP assumptions material (May 2026)
- IAWAI Water Services Strategy and related board material
- Growth Approach 2026 – IAWAI Brief
- Development Contributions Policies and schedules

Council's position is that it does not hold a discrete document that answers the refined request in the form of a standalone adequacy assessment.

4. Observations Relevant to Transparency and Pattern Analysis

- Growth targets and zoned development areas exist, but Council does not hold a comprehensive estimate of the total infrastructure cost of delivering that growth.
- The funded programme rests on an explicit assumption that third-party (developer) funding will fill the gap created by Council's financial constraints.
- No standalone internal document assessing the adequacy of the funded programme against growth targets was identified for release.
- Capacity constraints (particularly wastewater) and sequencing risks are acknowledged in internal growth-approach material, while the full cost and funding realism of the overall programme remains distributed across multiple planning documents rather than available as a single adequacy test.

This structure is relevant to wider questions about whether infrastructure planning and funding are being tested against stated growth and service objectives in a transparent, consolidated way.

5. Source Documents

- Hamilton City Council LGOIMA response (Ref 589926 and refined follow-up), July 2026
- Growth and Infrastructure Estimates package (prior related response)
- Growth Approach 2026 – IAWAI Brief (26 February 2026)
- 2024–2034 Long Term Plan and 2024–2054 Infrastructure Strategy (as referenced by Council)
- Related Activity Management Plans, Development Contributions Policies, and growth-projection material listed in the response

Public-interest transparency record prepared from primary LGOIMA response material and released source documents. July 2026.